

Message

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**From:** Sutton, Douglas [dsutton@hgl.com]  
**Sent:** 6/23/2021 1:14:08 PM  
**To:** Sklaney, Christopher [sklaney.christopher@epa.gov]  
**CC:** Schultz, Glen [gschultz@wm.com]; Fytilis, Nikolaos [nfytilis@hgl.com]  
**Subject:** RE: [EXTERNAL] RE: consent adjudication document

Terrific. Thank you!

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**From:** Sklaney, Christopher <sklaney.christopher@epa.gov>  
**Sent:** Tuesday, June 22, 2021 6:55 PM  
**To:** Sutton, Douglas <dsutton@hgl.com>  
**Cc:** Schultz, Glen <gschultz@wm.com>; Fytilis, Nikolaos <nfytilis@hgl.com>  
**Subject:** [EXTERNAL] RE: consent adjudication document

Doug,

Attached is the document. Another option is below.

Use this link: <https://semspub.epa.gov/src/home/search.jsf>

Type in the Region, Collection Type (Admin Record), State, and Site. Select the "Remedial" AR. This AR is large, as it contains documents supporting the decision for the ROD and both Amendments. Above each column is a search box. Type 113532 above the Document ID field. It should take you right to it.

As before, don't hesitate to call with any questions or additional research help. - Chris

**Christopher Sklaney**  
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**From:** Sutton, Douglas <dsutton@hgl.com>  
**Sent:** Tuesday, June 22, 2021 1:26 PM  
**To:** Sklaney, Christopher <sklaney.christopher@epa.gov>  
**Cc:** Schultz, Glen <gschultz@wm.com>; Fytilis, Nikolaos <nfytilis@hgl.com>  
**Subject:** consent adjudication document

Chris,

Here is more information about the document I am looking for related to the on-site study from the Consent Adjudication.

- Also in July 1987, Keystone signed a Consent Adjudication (CA) with PADER. The intent of the CA was to provide data for the development of an onsite groundwater remediation plan and to design and implement the plan. Keystone was required by the CA to analyze and summarize previously collected water quality data,

determine the effectiveness of the existing spray irrigation system, install 3 additional monitoring wells, abate groundwater contamination at the Site perimeter, prevent offsite groundwater contamination, and treat the contaminated offsite. (ROD, p. 4)

- EPA and PADER recognized that the two separate studies (the CA and the RI/FS) were being conducted on the Keystone Site. Therefore, it was agreed that the RI/FS would focus on obtaining offsite data while the CA study would focus on obtaining onsite data. (ROD, p. 4)
- The RI field work was conducted from May 1989 to April 1990 by the REM V Team. Activities were focused mainly offsite. Keystone was tasked by a Consent Adjudication with PADER to direct similar investigations which were focused mainly onsite. (RI, p. ES-2)
- Keystone also signed a Consent Adjudication (CA) with PADER in July, 1 987. The Intent of the CA was to provide data for development of an onsite groundwater remediation plan and to design and implement the plan. Keystone was required by the CA to analyze and summarize previously collected water quality data, determine the effectiveness of the existing spray Irrigation system, install 3 additional monitor welts, abate groundwater contamination at the site perimeter, prevent offsite groundwater contamination, and treat contaminated offsite groundwater. (RI, p. 1-7, 1-8)
- As agreed by PADER and EPA, the CA work by Keystone and the RI/FS work by REM V were to be related but with different objectives. Keystone's efforts were to focus primarily onsite while REM V Investigations were to be offsite. (RI, p. 1-8)

Thanks!!

Doug

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